

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) CRIMINAL ACTION NO. 05-30002-MAP
)
FRANK DEPERGOLA)

MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, through counsel, and requests this Honorable Court to modify his conditions of release to allow him to travel to Dover, VT to vacation with his children from Tuesday, February 21, 2006 through Friday, February 24, 2006. Assistant United States Attorney Todd Newhouse opposes this motion.

The Defendant,
By: _____
Michael L. Foy, Esquire
935 Main Street
Springfield, MA 01103
(413) 781-1106
BBO#176920

CERTIFICATE OF SERVICE

I, Michael L. Foy, do hereby certify that I have on this date served a copy of the foregoing document to Assistant United States Attorney Todd Newhouse at the United States District Court via facsimile at (413) 785-0394.

Date: February 17, 2006

Michael L. Foy, Esquire